IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW JERSEY **CAMDEN VICINAGE**

57166

IN RE: VALSARTAN PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

LEE ESTHER SMOOT

Case Number: 1:22-cv-00285

Master File No. 1:19-MD-02875 **MDL No. 2875**

HON. ROBERT B. KUGLER

HON. KAREN M. WILLIAMS

RULE 7.1.1(a) DISCLOSURE STATEMENT

Plaintiff, Lee Esther Smoot, hereby notify the Court, pursuant to Local Rule 7.1.1(a), that there is no person or entity not a party to this action providing funding for any portion of the Plaintiff's attorney's fees or expenses of litigation in exchange for a contingent financial interest based upon the results of the litigation or a non-monetary result that is not in the nature of a personal or bank loan or insurance.

Dated: January 24, 2022 Respectfully Submitted,

> /s/ Levi M. Plesset Levi M. Plesset (CA Bar No. 296039) MILSTEIN JACKSON FAIRCHILD & WADE, LLP 10990 Wilshire Blvd, 8th Floor Los Angeles, CA 90024 Telephone: (310) 396-9600

Facsimile: (310) 396-9635 lplesset@mjfwlaw.com

Attorney for Plaintiff, Lee Esther Smoot

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on January 24, 2022, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Levi M. Plesset
Levi M. Plesset